

Fill in this information to identify the case:

Debtor 1 Omer Albert Higley

Debtor 2

United States Bankruptcy Court for the: Middle District of Pennsylvania

Case number : 1:19-bk-00679-HWV

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: NewRez LLC d/b/a Shellpoint Mortgage Servicing

Court claim no.  
(if known):

7

Last 4 digits of any number you use to identify the debtor's account: 5318

Property Address: 2747 Horseshoe Pike  
Palmyra, PA 17078

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$

Part 3: Postpetition Mortgage Payment

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ 3,236.46
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ -937.41 Suspense
- c. Total. Add lines a and b. (c) \$ 2,299.05

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

2022-12-01

**Part 4: Itemized Payment History**

If the creditor disagrees in Party 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/S/ Christopher Giacinto Date 02/21/2023  
Signature

Print: Christopher Giacinto Title Authorized Agent for Creditor

Company Padgett Law Group

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 6267 Old Water Oak Road, Suite 203

Tallahassee FL, 32312

Contact phone (850) 422-2520 Email plginquiries@padgettlawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG**

IN RE: OMER ALBERT HIGLEY

No: 1:19-bk-00679-HWV  
CHAPTER 13

Debtor(s)

\_\_\_\_\_ /

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished to the parties on the attached Service List by electronic service and/or by First Class U.S. Mail on this the 21st day of February, 2023.

/S/ Christopher Giacinto

\_\_\_\_\_  
Christopher Giacinto  
PADGETT LAW GROUP  
6267 Old Water Oak Road, Suite 203  
Tallahassee, FL 32312  
(850) 422-2520 (telephone)  
(850) 422-2567 (facsimile)  
[plginquiries@padgettlawgroup.com](mailto:plginquiries@padgettlawgroup.com)  
*Authorized Agent for Creditor*

**SERVICE LIST (CASE NO. 1:19-bk-00679-HWV)**

Debtor

Omer Albert Higley  
2747 Horseshoe Pike  
Palmyra, PA 17078

Attorney

Gary J Imblum  
Imblum Law Offices, P.C.  
4615 Derry Street  
Harrisburg, PA 17111

Trustee

Jack N Zaharopoulos  
Standing Chapter 13  
(Trustee)  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

US Trustee

United States Trustee  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17101

Payment Changes	EF Date	P & I	Escrow	Other	Total	Was PCN/POC filed?	Was the Change Higher?
Change #0	3/1/2019	\$ 704.80	\$ 339.22	\$ -	\$ 1,044.02	Yes	NA
Change #1	12/1/2019	\$ 704.80	\$ 350.20	\$ -	\$ 1,055.00	Yes	Yes
Change #2	11/1/2020	\$ 704.80	\$ 350.77	\$ -	\$ 1,055.57	Yes	Yes
Change #3	3/1/2021	\$ 704.80	\$ 339.22	\$ -	\$ 1,044.02	Yes	No
Change #4	11/1/2021	\$ 704.80	\$ 362.77	\$ -	\$ 1,067.57	Yes	Yes
Change #5	11/1/2022	\$ 704.80	\$ 374.02	\$ -	\$ 1,078.82	Yes	Yes
Change #6		\$ -	\$ -	\$ -	\$ -	Yes	Yes
Change #7		\$ -	\$ -	\$ -	\$ -	Yes	Yes
Change #8		\$ -	\$ -	\$ -	\$ -	Yes	Yes
Change #9		\$ -	\$ -	\$ -	\$ -	Yes	Yes
Change #10		\$ -	\$ -	\$ -	\$ -	Yes	Yes
Change #11		\$ -	\$ -	\$ -	\$ -	Yes	Yes
Change #12		\$ -	\$ -	\$ -	\$ -	Yes	Yes
Change #13		\$ -	\$ -	\$ -	\$ -	Yes	Yes
Change #14		\$ -	\$ -	\$ -	\$ -	Yes	Yes
Change #15		\$ -	\$ -	\$ -	\$ -	Yes	Yes

Post Petition Due Date	12/1/2022
Amount Due	\$ 2,299.05
Debtor Suspense	\$ 937.41

[illegible]